

**Environmental
Protection Agency**

John E. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Kelly, Director

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January 30, 2012

Carrie Beringer
Heritage-WTI, Inc.
1250 St. George Street
East Liverpool, OH 43920

**RE: OHIO EPA COMMENTS ON THE SOIL MANAGEMENT AND SURFACE COVER
OPERATIONS AND MAINTENANCE PLAN, HERITAGE-WTI, INC., OHD 980 613 541**

Dear Ms. Beringer:

On November 7, 2011, MTR, on behalf of Heritage-WTI, Inc. (WTI) submitted to Ohio EPA a Soil Management and Surface Cover Operations and Maintenance Plan (Plan) for its facility located at 1250 Saint George Street, East Liverpool, Ohio. Based on Ohio EPA's review of this document, Ohio EPA has the following comments.

1. Page 3, Section 2.0 states that 4 feet or more below ground surface is an appropriate depth for the soil management procedures of this OMP to be applicable. The Plan should be revised to clarify how the soils from 0 to 4 feet below ground surface will be managed. The Plan should also be revised to clarify how it was determined that the 0-4 feet soil depths are not impacted (e.g., provide analytical data for the 0-4 feet soil depth ranges).
2. Page 4, Section 2.2, bullet 6. The Plan should be revised to remove the reference to placing excavated soil on plastic sheeting. Excavated soils should be placed into an appropriate container (e.g., roll-off box, drum, etc.).
3. Page 4, Section 2.2, bullets 7 and 8. The Plan should be revised to indicate that soil laboratory analytical data will be obtained prior to determining whether soils are impacted or non-impacted.
4. Page 4, Section 2.2. The Plan states that for the purposes of implementing this OMP, a sustained VOC measurement of 50 ppm or more above background level is indicative of potentially impacted soil that will be managed separately. The Plan should be revised to provide additional information regarding the statement VOC measurement of 50 ppm or more above background level (e.g., will this measurement be taken with a PID meter, what are the background levels for each constituent, how was 50 ppm determined and does the 50 ppm satisfy a predetermined risk assessment demonstration). Ohio EPA typically uses soil laboratory analytical data to determine if soil is impacted or not impacted. Additionally, Ohio EPA typically reviews values on an individual compound basis, not on a total VOC basis. The Plan could be revised to indicate that if soil is above industrial risk assessment values, then those soils will be managed as impacted soils. These industrial risk assessment values should be included in the Plan. These values would be applicable at any depth not just below 4 feet.

HERITAGE-WTI, INC.

OHIO EPA COMMENTS ON THE SOIL MANAGEMENT AND SURFACE COVER
OPERATIONS AND MAINTENANCE PLAN

JANUARY 30, 2012


PAGE 2 OF 2

5. Page 5, Section 2.3. The Plan indicates that non-impacted soil may be re-used as backfill material. The Plan should be revised to clarify how the soil will be determined to be non-impacted (e.g., comparison of laboratory analytical data to pre-established values).
6. Pages 5 and 6, Sections 3.1 and 3.3. The Plan indicates that a sealant is applied to the concrete to resist chemical corrosion or to maintain the integrity and extend the useful life of the cover material. The Plan should be revised to indicate if the sealant is still intact on all portions of the concrete or structure floors and if the sealant is reapplied on a regular basis or as observable wear of the sealant is identified.
7. Page 7, Section 5.0 states that OMP implementation, including inspections, will continue while active operations occur at the facility. The Plan should be revised to indicate that OMP implementation, including inspections, will continue as long as the environmental covenant is in effect that restricts the property to industrial use.

Per Permit Conditions E.9(d)(ii) and E.9(e)(ii), please provide a response and revised Soil Management and Surface Cover Operations and Maintenance Plan within 45 days of receipt of these comments.

If you have any questions, please feel free to contact me at (330) 963-1141.

Sincerely,



Shannon Ryan
Division of Environmental Response and Revitalization

SR:ddw

cc: Michelle Tarka, DMWM, NEDO
Rich Kurlich, DDAGW, NEDO
Bill Zeli, MTR, Inc.
ec: John Palmer, DERR, NEDO
Harry Courtright, DERR, NEDO
Frank Popotnik, DMWM, NEDO
Jeremy Carroll, DMWM, CO
Ed Lim, DERR, CO
Rodney Beals, DERR, NEDO



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January 30, 2012

Carrie Beringer
Heritage-WTI, Inc.
1250 St. George Street
East Liverpool, OH 43920

**RE: HERITAGE-WTI, INC., OHD 980 613 541, COLUMBIANA COUNTY
SEMI-ANNUAL GROUND WATER REPORTS FOR 2011**

Dear Ms. Beringer:

On April 19, 2011 and October 11, 2011, Ohio EPA received the Semi-Annual Ground Water Monitoring Results (Reports) for the January 2011 and July 2011 sampling events, respectively. The Reports document the ground water monitoring activities that occurred at the Heritage-WTI, Inc. (WTI) facility located at 1250 Saint George Street, East Liverpool, Ohio. As you are aware, WTI's State of Ohio Hazardous Waste Facility Installation and Operation permit previously required implementation of a semi-annual ground water detection monitoring plan. Under this plan, ground water beneath the facility has been monitored since 1994.

The ground water monitoring wells were sampled semi-annually during the weeks of January 10, 2011 and July 11, 2011. The ground water monitoring results for both events were submitted to Ohio EPA in April and October 2011, respectively, to evaluate whether WTI had adequately followed its ground water detection monitoring program. Ohio EPA reviewed the Reports to evaluate WTI's compliance with Ohio Administrative Code (OAC) rules 3745-54-90 through 3745-54-100. Based on Ohio EPA's review, Ohio EPA has one comment.

1. Semi-Annual Ground Water Monitoring Results for the January 2011 sampling event. A sample receipt form was not included with the analytical data. This information is needed to document the condition of samples upon arrival at the laboratory, and is reviewed as part of the Tier I Data Validation.

HERITAGE-WTI, INC.
SEMI-ANNUAL GROUND WATER MONITORING REPORTS FOR 2011
JANUARY 30, 2012
PAGE 2 OF 2

The facility should submit the sample receipt form for the January 2011 analytical data to Ohio EPA for review. A sample receipt form should be included with future submittals of analytical data.

If you have any questions, please feel free to contact me at (330) 963-1141.

Sincerely,



Shannon Ryan
Division of Environmental Response and Revitalization

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Bill Zeli, MTR, Inc.
Wen Huang, U.S. EPA, Region V
Frank Popotnik, DMWM, NEDO
ec: John Palmer, DERR, NEDO
Harry Courtright, DERR, NEDO

Failure to cite specific violations and deficiencies in this communication does not relieve Heritage-WTI from complying with all applicable rules and regulations. Please be advised that any instances of non-compliance can continue as subjects of pending or future enforcement actions.

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January 30, 2012.

Carrie Beringer
Heritage-WTI, Inc.
1250 St. George Street
East Liverpool, OH 43920

**RE: OHIO EPA COMMENTS ON THE INTEGRATED GROUND WATER MONITORING
PLAN, HERITAGE-WTI, INC., OHD 980 613 541**

Dear Ms. Beringer:

On November 7, 2011, MTR, on behalf of Heritage-WTI, Inc. (WTI), submitted to Ohio EPA an Integrated Ground Water Monitoring Plan for its facility located at 1250 Saint George Street, East Liverpool, Ohio. Based on Ohio EPA's review of this document, Ohio EPA has the following comment.

1. Page 5. Section 2.1 describes the ground water monitoring well network. In particular, the last paragraph states that four wells (PA-01, PA-05, PA-06 and RW-1) and five piezometers (P-1, P-3, P-4, P-5 and P-6) also currently exist at the site. The section further indicates that these wells and piezometers could be used, if necessary, to obtain ground water level measurements and clarify the shallow ground water contours.

Ohio EPA is concerned that the startup of RW-1 as a water supply well will increase the complexity of ground water flow across portions of the site. For this reason, Ohio EPA recommends that P-5 and P-6 be incorporated into the monitoring network as piezometers to further evaluate the radius of influence of RW-1 while it is in service. Also, Ohio EPA recommends that wells PA-01, PA-06, and PA-05 be incorporated into the monitoring network as piezometers to better monitor ground water flow across the central portion of the site. Therefore, the work plan should be revised to state that ground water level measurements will also be collected from P-5, P-6, PA-01, PA-05, and PA-06.

Please note that due to this revision, a permit modification request should also be submitted by WTI to Ohio EPA to incorporate this change into WTI's Hazardous Waste Installation and Operation Permit.

HERITAGE-WTI, INC.

OHIO EPA COMMENTS ON THE INTEGRATED GROUND WATER MONITORING PLAN

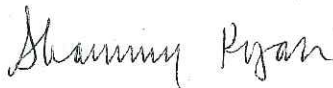
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Per Permit Condition E.9(c)(ii), please provide a response and revised Integrated Ground Water Monitoring Plan within 45 days of receipt of these comments.

If you have any questions, please feel free to contact me at (330) 963-1141.

Sincerely,



Shannon Ryan

Division of Environmental Response and Revitalization

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January 30, 2012

Carrie Beringer
Heritage-WTI, Inc.
1250 St. George Street
East Liverpool, OH 43920

**RE: OHIO EPA COMMENTS ON THE LNAPL REMEDIATION SYSTEM OPERATIONS
AND MAINTENANCE PLAN, HERITAGE-WTI, INC., OHD 980 613 541**

Dear Ms. Beringer:

On November 7, 2011, MTR, on behalf of Heritage-WTI, Inc. (WTI) submitted to Ohio EPA a LNAPL Remediation System Operations and Maintenance Plan for its facility located at 1250 Saint George Street, East Liverpool, Ohio. Based on Ohio EPA's review of this document, Ohio EPA has the following comments.

1. Section 4.1. Page 5 of the Plan indicates that if LNAPL accumulations in a well without a skimmer persist, a skimmer will be placed in the well and monitored similar to skimmers currently in place. This sentence should be revised to state that if LNAPL accumulations in a well without a skimmer persist for 3 consecutive months, a skimmer will be placed in the well and monitored similar to skimmers currently in place.
2. Section 4.1. Page 5 of the Plan also indicates that if an accumulation of LNAPL is not observed in a skimmer or monitoring well for three consecutive months, the skimmer will be removed from that well. It further indicates that LNAPL monitoring will continue for nine additional months after all skimmers are removed, for a total of 12 months with LNAPL observations. This section should be revised to indicate that if an accumulation of LNAPL is not observed in the PA-07 or WTI-06 skimmers or wells PA-07 and WTI-06 for 12 consecutive months, the skimmer will be removed from the well. If an accumulation of LNAPL is not observed in a skimmer in the other LNAPL monitoring wells or in the other LNAPL wells themselves for 3 consecutive months, the skimmer will be removed from the well. To allow for seasonal variations, monthly LNAPL monitoring will continue after all skimmers are removed for an additional 12 months. After that point, LNAPL monitoring will remain as part of the site-wide integrated ground water monitoring program. In the future, if LNAPLs are again detected, the monthly LNAPL recovery program will be re-implemented.

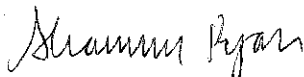
HERITAGE-WTI, INC.
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Based on the monthly reports submitted for July 2011, August 2011, and September 2011, trace amounts to 0.01 gallons of LNAPL were removed from the skimmer in PA-07 with no LNAPL observed in well PA-07 during those months. However, during the monthly monitoring event for October 2011 (the fourth month), the skimmer in PA-07 was full of LNAPL with approximately 0.55 feet of LNAPL present in the well following skimmer removal. The skimmer in PA-07 was also full of LNAPL during two additional checks of the skimmer performed in October 2011.

Per Permit Condition E.9(b)(ii), please provide a response and revised LNAPL Remediation System Operations and Maintenance Plan within 45 days of receipt of these comments.

If you have any questions, please feel free to contact me at (330) 963-1141.

Sincerely,



Shannon Ryan
Division of Environmental Response and Revitalization

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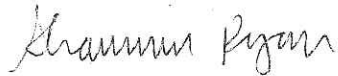
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SEMI-ANNUAL GROUND WATER MONITORING REPORTS FOR 2011
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